

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re Terrorist Attacks on September 11, 2001

03 MDL 1570 (GBD)(SN)

This document relates to:

Federal Insurance Co., et al. v. al Qaida, et al., 03-cv-6978
Vigilant Insurance Co., et al. v. The Kingdom of Saudi Arabia, et al., 03-cv-8591
Pacific Employers Ins. Co., et al. v. The Kingdom of Saudi Arabia, et al., 04-cv-7216
Underwriting Members of Lloyd's Syndicate 53, et al. v. The Kingdom of Saudi Arabia, et al., 17-cv-2129
Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., 16-cv-07853
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. The Kingdom of Saudi Arabia, et al., 17-cv-7914

**DECLARATION OF SEAN P. CARTER IN SUPPORT OF THE MOTION TO
WITHDRAW JAMES D. SCHULTZ AS ATTORNEY OF RECORD**

1. I, Sean P. Carter, hereby certify under penalty of perjury, that the following is true and correct and in my personal knowledge.
2. I am over the age of 18, and serve as the co-chair for the Plaintiffs' Executive Committee for Commercial Claims in the multi-district litigation proceeding, *In Re Terrorist Attacks on September 11, 2001*, Civil Action No. 03 MDL 1570 (GBD)(SN).
3. I am familiar with the proceedings in this case. I have been lead counsel for the Plaintiffs in the above-referenced cases since they were commenced. I make this statement in support of Plaintiffs' Motion to Withdraw James D. Schultz as attorney of record for the Plaintiffs in the above-referenced matters.
4. James D. Schultz is no longer affiliated with Cozen O'Connor.

5. For the foregoing reason, the undersigned respectfully requests that this Court grant Plaintiffs' Motion to Withdraw James D. Schultz as attorney of record in the above-referenced actions. A proposed Order is attached for the Court's convenience.

Dated: September 14, 2020

/s/ Sean P. Carter